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February 24, 2006

VIA ELECTRONIC FILING AND HAND DELIVERY

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station  
Boston, MA 02110

Re: D.T.E. 05-82, Dig Safe One-Call 811

Dear Ms. Cottrell:

Attached for filing in the above referenced docket are an original and three (3) copies of the Petition of Bay State Gas Company for Leave to Intervene.

Very truly yours,

Patricia M. French

cc: Tina Chin, Esq., Hearing Officer DTE  
Joseph Rogers, Assistant Attorney General  
Kurt Bratten, Esq., Gesmer Updegrove

DIG SAFE	)	D.T.E 05-82
811 ONE-CALL	)	
	)	
	)	

NOW COMES Bay State Gas Company (“Bay State”) and respectfully petitions the Department of Telecommunications and Energy (the “Department”) for leave to intervene in the above proceeding, pursuant to G.L. c. 30A, § 10, and 220 C.M.R. 1.03.

1. Bay State is a Massachusetts gas company, as defined in G.L. c. 164, § 1, and is subject to the Department's jurisdiction. The principal address of Bay State is:

2. On October 10, 2005, Dig Safe Systems (“Dig Safe”) filed with the Department its request that the Department establish 811 as the one-call number for routing underground facilities damage prevention calls pursuant to the Pipeline Safety Act of 2002. The Department thereafter opened this investigation.

3. Any decisions made by the Department in this proceeding with respect to the feasibility and technology required to implement 811 as the one-call system for Dig Safe will impact the cost and safety of Bay State's provision of distribution service and its

underground infrastructure. Accordingly, Bay State wishes to participate in this proceeding.

4. Bay State has a unique interest in the protection of its underground facilities. Bay State's interest cannot be adequately represented by any other party.

5. Bay State further requests that the following individuals be included on the official service list of this proceeding:

Danny G. Cote, General Manager  
Bay State Gas Company  
300 Friberg Parkway  
Westborough, MA 01581-5039

Patricia M. French, Senior Attorney  
NiSource Corporate Services Company  
300 Friberg Parkway  
Westborough, MA 01581-5039

WHEREFORE, Bay State Gas Company respectfully requests that the Department of Telecommunications and Energy grant its Petition to Intervene in D.T.E. 05-82.

Respectfully submitted,  
BAY STATE GAS COMPANY

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*Its Attorney*

Dated: February 24, 2006